

ecology and environment, inc.

EPA Region 5 Records Ctr.

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International Specialists in the Environmental Sciences

DATE:

June 17, 1981 .

10:

File

FROM:

Thomas Lentzen

SUBJECT: Illinois/Eckhardt Report

Mendota/Trekker Chemical Co.

E&E #IL-20

Introduction

At the request of the United States Environmental Protection Agency (USEPA), Region V, Chicago IL, an on-site inspection in conjunction with subsequent sampling was undertaken to determine if contamination to the environment, specifically to ground and/or surface water via improper operational procedures, could occur at the Trekker Chemical Company plant.

Performed pursuant to TDD #F5-8103-6, background data, which included reviewing existing Preliminary Assessment Forms, contacting company cfficials as well as state and Federal EPA personnel was completed.

The site, indentified under the Eckhardt Report, was previously researched (Preliminary Assessment Form), by FIT under TDD #F5-8005-3.

SECTION I - Site Description/Ownership

Located in LaSalle County, approximately two miles south of Mendota, the Trekker Chemical Plant is situated on roughly eight to ten acres of land. Spring Creek, an intermittent stream lies approximately one-half mile west of the plant while farmland generally encompasses the site.

Previously, this plant was owned and operated by both Helena Chemical and the Amoco Oil Company, with Helena holding a 51% share of the operation. It was not until the latter part of 1969 that Helena sold their share of the operation to Amoco. Thus, since 1969 Amoco has owned and operated the plant. Having filed under RCRA as a generator and transporter, Trekker Chemical manufactures (formulates) mixtures of pesticides, herbicides, and fertilizers using a dry and liquid blending operation. Although partially enclosed by a wire fence, the plant utilizes for security purposes a night watchman/janitor seven days per week.

SECTION II - Background Information

A) History

Although the site has not had a history of past violations according to information obtained from Mr. Brad Benning and Mr. Chuck Corley of the Illinois Environmental Protection Agency (IEPA), the site was extensively investigated during the latter part of 1977 and the early part of 1978 for possible air pollution violations. Citizen complaints were received by the Agency in reference to obnoxious odors stemming from the plant. These odors were traced back to the chemical phorate, an extremely toxic substance that the plant uses. To curtail this odor, an air purifier was installed by the company. This in turn eliminated the odor.

Several spills by the plant have been recorded by the IEPA. The most recent, according to Mr. Corley was an oil spill which occurred during the Spring of 1981. In a conversation with Mr. Logan, Manager of the Pesticides Division for Amoco, Mr. Logan stated that this spill may not have been caused by Trekker but possibly by the company located adjacent to the west. Mr. Corley also stated that the company, approximately two years ago had a spill of trifuralin which eventually found its way into Spring Creek, via a road side ditch. Mr. Logan stated that this material was not trifuralin but just their raw clay that was being unloaded. Because of high winds, their consignor head was disrupted and instead of distributing this clay to their holding bins, the high winds blew this material off of their property.

In a conversation with Mr. Ralph Coons from the USEPA, it was learned that approximately two years ago the company spilled roughly 50 gallons of oil and possibly contaminated Spring Creek.

B) Local Geology/Soils

Situated in the Bloomington Ridged Plains within the Till Plains section of Central Lowland Province, LaSalle County had repeatedly been covered by at least three of the four major advances of continental glaciers which occurred during the Pleistocene Age. It was not until the last advance, the Wisconsin glaciation, that much of the present

B) Local Geology/Soils (con't)

topography seen today emerged. The Bloomington Ridged Plain, consisting of glacial till is characterized by low, broad, morainic ridges (end moraines) with intervening wide stretches of relatively flat or gently undulating ground moraines. This glacial till, having a high clay content and a moderately fine textured nature, ranges in thickness from 50 feet or less to over 500 feet in the northwest corner of the county. Illite is the dominant clay mineral in the till, ranging from 50 to 70 percent.

Loess, a silt size, wind deposited material, originating mainly from the floodplains of the major glacial outwash streams, covers the upland parts of the county and varies in thickness from 5 to 10 feet in the west to less than 2 to 3 feet thick in the eastern part of the county.

Bedrock, exposed within the county consists generally of sandstone, shale and limestone.

Two major soil types can be found within the area of the site, they are:

- 1. Muscatine silt loam 0-2% slopes
- 2. Sable silty clay loam

The Muscatine silt loam is a somewhat poorly drained soil that has developed in more than 5 feet of loess. Occurring on nearby level to very gently sloping loess covered uplands, available moisture capacity is very high while surface runoff and permeability are slow to moderate.

The Sable silty clay loam are soils that have developed in more than 60 inches of loess. Occurring on level to nearby level loess covered uplands, available moisture capacity is high to very high while permeability is generally moderate. Surface runoff is slow to ponded.

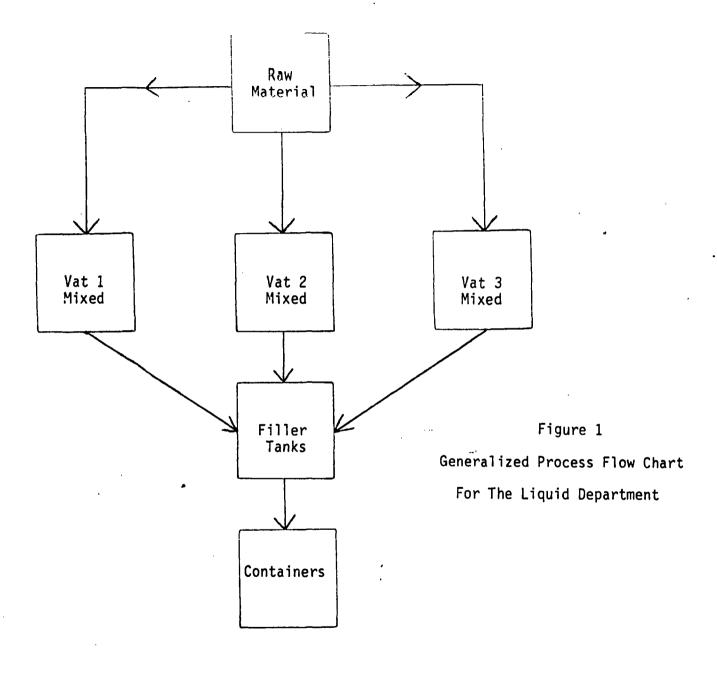
SECTION III - Operational Procedures

The following information has been obtained through conversations with Mr. Arch Logan, Manager of the Pesticides Division, Mr. Art Smith, Plant Manager at Trekker and also from the on-site inspection.

The plant is divided into two departments, the Liquid Department and the Granular Department. Within the Liquid Department the raw materials of toxaphene, methoxychlor, and malathion are obtained from Trekker's suppliers at concentrations of approximately 90 percent purity. Received in drums, this material is distributed to three mixing vats located within the department. Toxaphene, an insecticide, is blended with xylene to reduce the overall concentration of this material to 66 percent. Methoxychlor, an insecticide, is blended with crop oil (mixture of two oils) and heater oil (probably kerosene) to reduce the initial raw concentration of 90 percent, down to a 25 percent concentration level. Malathion, and insecticide and acaricide, is blended and brought down to a concentration that is desirable. At least two types of detergents are believed used to emulsify these materials and thus are included within the blending period. Micro-nutrients, a fertilizer is also blended within one of the mixing vats. Except for the micro-nutrient vat these vats are not closed systems. The vats are used interchangeably and cleaned prior to the blending of another chemical.

Following the blending period, each vat has the capacity to be pumped individually to one of three stainless steel filler tanks. Depending upon the type of container that is to be filled, will dictate which filler tank this material is pumped into (see Figure 1).

Presently the Granular Department contracts out to various companies to formulate mixtures of phorate, trifluralin, and benefin. Phorate, an insecticide, and acaricide, is received by the company in metal drums as a liquid, while trifluralin and benefin, both herbicides, are received in fibrous drums in a crystal form. Trifluralin and benefin are transferred to the Liquid Department were they are melted down with the help of Panasol (organic solvent), in one of the mixing vats. This material is then returned to the Granular Department as a liquid.



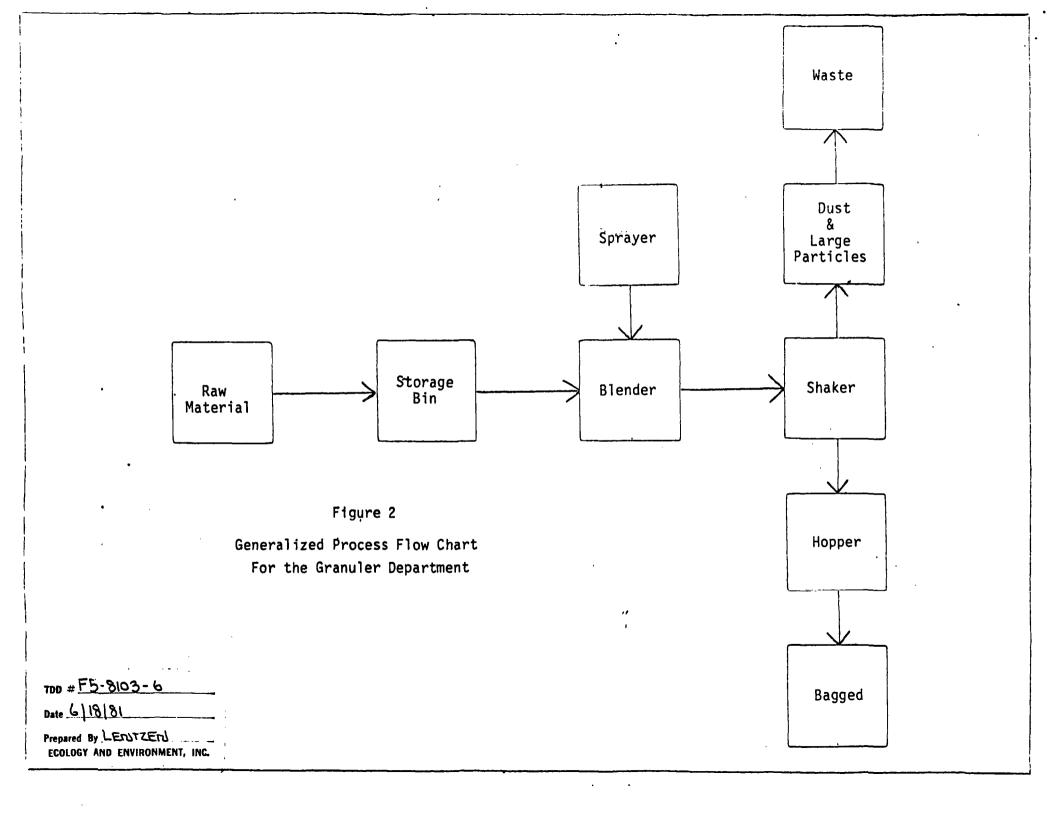
TDD # <u>F5-8103-6</u>
Date 6|18|81

Prepared By LENTZEN

ECOLOGY AND ENVIRONMENT, INC.

SECTION III - Operational Procedures (con't)

Clay from the state of Georgia is received by the company via railroad cars. The clay is stored within a number of bins located outside of the plant. When needed, the clay is transferred from the bins to an enclosed blender inside the plant. As the blender rotates, a set of nozzels connected to the blender spray the clay particles inside with either of the previous mentioned chemicals from the Granular Department. After the clay has been sprayed, the material proceeds to a shaker which seperates unwanted dust and large size clay particles. The material is then sent (elevated) to a hopper where this material is bagged (see Figure 2). The dust and large size particles, considered a hazardous waste is drummed and rauled by the company to a licensed landfill.



·SECTION IV - Findings

A) On-site Inspection

On May 14, 1981 an on-site inspection was performed at the Trekker Chemical Company plant. Present at the onset of this inspection were: Mr. Arch Logan, Manager of the Pesticides Division; Mr. Ron Ganim, Attorney for Amoco; Mr. Art Smith, Plant Manager; and Mr. Thorn Traise, Chemist for Amoco. An agreement providing secrecy for information deemed confidential by Trekker Chemial was signed by both parties using Ecology and Environment's memorandum. After signing this agreement, a complete inspection of the site, which included a tour of their manufacturing facility was made. Throughout the inspection, Mr. Logan was extremely helpful in explaining their operational procedures and in answering any questions that were posed to him.

During the inspection one area in particular received special attention by the FIT team. This interest was generated initially through conversations with Mr. Chuck Corley from the IEPA and centered in the basement area located below the mixing vats. According to Mr. Corley there is a potential for the basement to flood during a heavy rainstorm. This basement area houses all pipes and possibly regulation valves for the transferring of their blended products to their filler tanks. A sump pump and two sump pits along with a stand pipe have been installed by the company to control flooding. All water within the sump pits, according to Mr. Logan, is pumped to a 500 gallon holding tank to be used in their micro-nutrient operation (see Section III - Operational Procedures).

Another area of concern centered in Trekkers' warehouse were a metal grate was seen on the floor. According to Mr. Smith, a catch basin is below this grate and supposedly is not connected with a drainage tile.

B) Sampling

Based upon the information learned from the on-site inspection, and in keeping with direction of the TDD, two hazardous samples were collected and split with the company. The two samples taken, came from the two sump pits located in the basement below the mixing vats.

SECTION V - Recommendations

As stated in Section IV - Findings, under On-site Inspection, two areas of concern were noted by the inspection team. It is felt that these areas need to be reemphasized prior to any recommendations being made. Clarifications are needed in these areas and thus the following statements pose the questions, if material is spilled and if material entered into these sump pits.

The first area, located in the basement of the plant beneath the mixing vats, has been subject to flooding due to a high water table in the past. As previously stated, the plant has installed a sump pump, two sump pits and a stand pipe to control flooding, which according to Mr. Smith has performed its function. The potential for surface water/groundwater contamination could occur based upon the following conditions:

- Since the basement houses all necessary pipes and possibly valves needed to pump material from the vats to their filler tanks, the possibility of a leak, specifically from any piping joints, valves, connections could occur. Although the sump pits are approximately 3 feet x 3 feet and located in the southwest corner of the basement and not directly underneath the mixing vats, it is felt that if a leak did occur material could get into these pits. The water within the pits is groundwater which rises and falls dependent upon weather conditions.
- These sump pits, and the sump pump supposedly control flooding and supposedly all water is pumped to a 500 gallon tank and used for the manufacturing of their micro-nutrients. Questions can arise, if a leak did occur, and material spilled into these pits, would all this material be pumped to their 500 gallon tank and then used for their micro-nutrient production? Would this be a cause of concern, specifically if this material is sold as a fertilizer, or would this material be drummed and hauled away as a hazardous substance? Could some material escape this sump pump? Contamination to the groundwater could occur if material is spilled into the pits especially if the pump is not working?

- The possibility exists for material to be spilled by human error from the top of the vats, and thus the possibility exists for this material to find it's way into the pits and into the groundwater.
- Are these pits connected to an underground drainage tile?
 According to Mr. Logan they are not though he was not sure.
 This should be clarified.

The second area is located in the Granular Department warehouse were a metal grate was seen on the floor. According to Mr. Smith this grate lies above a concrete pit (probably a catch basin) and is not connected to any drainage system. The concern with this was if indeed Mr. Smith is correct and this concrete pit of unknown size is not connected to an underground drainage system. If this pit is connected to a drainage system and if one bag, or two bags, or several bags of their finished product is broken, what are the possibilities of this material finding is way to the pit, and in connected, of being washed out? The area is a discharge zone with the possibility of Spring Creek receiving contamination. According to Mr. Smith, any spill is cleaned up by using a vacuum.

It is felt these areas need clarification either through verbal confirmation/commitment of through another on-site inspection specifically addressing the determination of an underground drainage system and the possibility of contamination to groundwater from the sump pits. The analyses of the samples may help in determining the direction to be taken, though during the on-site inspection the plant was not formulating mixtures of their pesticides/herbicides, only their micro-nutrients. When the sample results are available, final recommendations will be made in a memo.

Also, the site presently has an SPCC Plan, but construction has not begun. Verification should be made towards the latter part of the year to see if construction has indeed begun or has finished. The plan should also be checked to see if it addresses the above mentioned potential spills. If not, consideration should be given to rejecting the plan.

EPA	POTENTIAL HAZARDOUS SITE INSPECTION R			REGION	SITE NUMBER (to be seeigle od by Hg)
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A. SITE NAME		B. STREET (OF	other identifier)		. - П
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G. SITE OPERATOR INFORMA		工	61068		SALLT
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3. CITY			· — — —	4. STAT	E B. ZIP CODE
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J. TYPE OF OWNERSHIP			,		
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	II. TENTATIVE DISPOSITION				
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C. PREPARER INFORMATION			 		
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A. PRINCIPAL INSPECTOR IN	III. INSPECTIO	N INFORMATIO	<u> </u>	- 	· · · · · · · · · · · · · · · · · · ·
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3. ORGANIZATION			<u> </u>	4. TELE	PHONE NO. (area code & no.
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C. SITE REPRESENTATIVES I	NTERVIEWED (corporate officials, work	ers, residents)			
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III. INSPECTION INFORMATION (continued)								
D. GENEFATOR INFORMATION	N (sources of weste)							
1. NAME	2. TELEPHONE NO.	3. ADDF		4. WASTE TYPE GENERATED				
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E. TRANSPORTER/HAULER II	NFORMATION							
1. NAME	2. TELEPHONE NO.	3. ADDF		4.WASTE TYPE TRANSPORTED				
TPICKKER -ENITOR	815 539-6796	PIT. 51 2 TELES	NOTE	PESTICIDE DUST				
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F. IF WASTE IS PROCESSED O	N SITE AND ALSO SHIPP	ED TO OTHER SITES, IDENT	IFY OFF-SITE FACILIT	IES USED FOR DISPOSAL.				
1. NAME	2. TELEPHONE NO.	•	3. ADDRESS					
- NA -								
G. DATE OF INSPECTION	H. TIME OF INSPECTIO	I. ACCESS GAINED BY: (cre	dentials must be shown	in all cases)				
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J. WEATHER (describs)				-				
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<u>′</u>	IV	. SAMPLING INFORMATIO						
A. Mark 'X' for the types of s etc. and estimate when the			ent e.g., regional lab,	other EPA lab, contractor,				
1.SAMPLE TYPE	2. SAMPLE TAKEN (mark 'X')	3.5AMPL1	E SENT TO:	4. DATE RESULTS AVAILABLE				
a. GROUNDWATER								
b. SURFACE WATER								
C. WASTE				·				
d. AIR								
e. RUNOFF			•					
£ SPILL								
g. SOIL								
h. VEGETATION			•					
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D. S TE MAPPED?				-			•		
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E. COOREINATES									
1. LATITUDE (degminsec.) 2. LONGITUDE (degminsec.)									
			V. SITE INFO	<u> </u>	MATION				
A. SITE STATUS			V. 371 E 1117 C		ma110N				
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B. 15 GENERATOR ON SITE?	<u>-</u>	<u>. </u>		L_					
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C. AREA OF SITE (in acres)	٠	1	RE BUILDINGS O		· - • -				
≈ 8-10 ACRES					- 	_	 		
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Indicate the major site activity	Ixi	ind details rei	aung to each ac	X.		bis FX	le boxes.		
A. TRANSPORTER	且	в. sт	ORER	Ê	C. TREATER	Ë	D. DISPOSER		
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6 OTHER(specify):	Н,	B. OTHER(speci	fy):	_	6. BIOLOGICAL TREATMENT	_	6.INCINERATION		
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		VII.	WASTE RELAT	ΕD	INFORMATION				
A. WASTE TYPE				_		_	•		
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B. WASTE CHARACTERISTICS									
1. CORROSIVE	2. IG	NITABLE	3. RADIOAC	TI	IVE 4. HIGHLY VOLATILE				
X 5. TOXIC	6. RE	ACTIVE	7. INERT		B. FLAMMABLE				
									
C. WASTE CATEGORIES		. 				_			
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VIII. HAZARD DESCRIPTION (continued)
The value to testing them.
- NA -
· · · · · · · · · · · · · · · · · · ·
] I. FISH KILL
- UNIKNOWN AT PRESENT, NOT BELIEVED THOUGH
J. CONTAMINATION OF AIR
-17
- NA-
K. NOTICEABLE ODORS
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- SLIGHT ODOR WAS NOTICED ON-SITE BY THE
INSPECTION TEAM
L. CONTAMINATION OF SOIL
ול-ייבי יבי מת מת מת ביבתיד
- UNIKNOWN AT PRESENT
M. PROPERTY DAMAGE
- · · · · · · · · · · · · · · · · · · ·
- NA-

Continued From Page 6 VIII. HAZARD DESCRIPTION (continued)	
N. FIRE OR EXPLOSION	
- NA·	
77	
O. SPILLS/LEAKING CONTAINERS/RUNOFF/STANDING LIQUID	
- SPILLS HAVE BEEN ASSOCIATED WITH SITE	
THOUGH NOTICED DURITUG INSPECTION.	
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P. SEWER, STORM DRAIN PROBLEMS	
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<u> </u>	
- POTENITIAL FOR UNDERGROUND DRATINAGE TILES TO	
PICK UP SPILLED MATERIAL AND WHILL THE	
MATERIAL OFF SITE	
Q. EROSION PROBLEMS	
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[] R. INADEQUATE SECURITY	
Come Folkicker supermind and inter tour	
· SITE ENCLOSED PARTIALLY BY WIRE FERCE	
- PUTCHT WETCHTHIN / JAYSTON PRESENT 7 DAYS WEEK	
1227	
	•
S. INCOMPATIBLE WASTES	
- NH -	

DACE 7 OF 10

Continue On Paulica

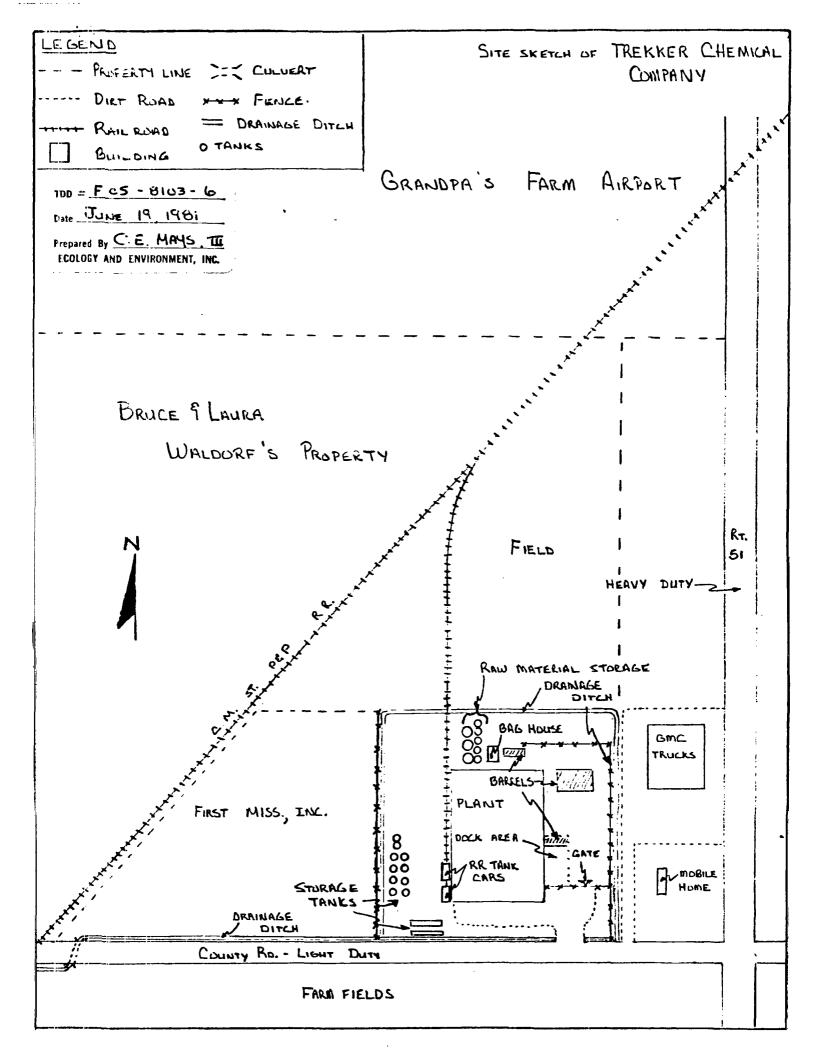
FOI F. - 7-770 1 (10,70)

		VIII. HAZARD DES	CRIPTION (continued)		······································	
T. MIDNIGHT DUMPING		•	- Troit (commed)			
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		· .				
U. OTHER (*pecify):			•			•
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	IV	POPULATION DIREC	TLY AFFECTED BY SI	TE		·
	17.	OF OCATION DIREC				<u> </u>
ALOCATION OF POPULATION	В.	APPROX. NO.	C. APPROX. NO. OF PEC AFFECTED WITHIN	PLE	D. APPROX. NO. OF BUILDINGS	E. DISTANCE TO SITE
	OF PE	OPLE AFFECTED	UNIT AREA	ľ	AFFECTED	(apecity units)
	GREH	THAN		i	· · · · · · · · · · · · · · · · · · ·	0.1
1. IN RESIDENTIAL AREAS		1000	100 - 250	ŀ	250	1 ≈ 3/4 TILE
2. IN COMMERCIAL 2. OR INCUSTRIAL AREAS				i		
4. OR INCUSTRIAL AREAS	<		- UNKNOWN			7
3. IN PUBLICLY	,		11211212	I		<u> </u>
TRAVELLED AREAS	_		- UNKNOWN			
4. PUBLIC USE AREAS 4. (parks, schools, etc.)	,	•	11011/010/101			
(parks, serious, vice)			- UNKNOWN			
A. DEPTH TO GROUNDWATER (speci	ly unit)	X. WATER AND	HYDROLOGICAL DAT		OUNDWATER USE IN	VICINITY
BELIEVED LESSTHAN!	_	BELTEVED	1.1		_	
D. POTENTIAL YIELD OF AQUIFER	J 71.	E. DISTANCE TO DRIE	NKING WATER SUPPLY	F. Di	POTHIBLE	G WATER SUPPLY
OUN.		(epecify unit of mea			UNK	
G. TYPE OF DRINKING WATER SUP	PLY	ו יייאל		L	0,011	
1	2. COMMU	INITY (specify town):				
< 15 CONNECTIONS	> 15 C	NNECTIONS -				
3. SURFACE WATER	4. WELL					
EPA Form 72070-3 (10-79)		PAGE	8 OF 10		Contin	ue On Page 9

Continued From Page 8 X. WATER AND HYDROLOGICAL DATA (continued) H. LIST ALL DRINKING WATER WELLS WITHIN A 1/4 MILE RADIUS OF SITE 4. NON-COM-MUNITY (mark 'X') COMMUN-ITY (mark 'X') 1. WELL 2. DEPTH (specify unit) 3. LOCATION (proximity to population/buildings) (- 101 ≈ 200 YDS NJF OF UNK 6105 Ol= UNIK S OF UNK G104 * つのて I. RECEIVING WATER 3. STREAMS/RIVERS 2. SEWERS 1. NAME SPRING CREEK 4. LAKES/RESERVOIRS S. OTHER (specify): 6. SPECIFY USE AND CLASSIFICATION OF RECEIVING WATERS - UNIK -XI. SOIL AND VEGITATION DATA LOCATION OF SITE IS IN: A. KNOWN FAULT ZONE B. KARST ZONE C. 100 YEAR FLOOD PLAIN F. CRITICAL HABITAT G. RECHARGE ZONE OR SOLE SOURCE AQUIFER E. A REGULATED FLOODWAY XII. TYPE OF GEOLOGICAL MATERIAL OBSERVED Mark 'X' to indicate the type(s) of geological material observed and specify where necessary, the component parts. C. OTHER (opecify below) A. CYERBURDEN B. BEDROCK (specify below) T. SAND LITTESTONE XIII. SOIL PERMEABILITY B. VERY HIGH (100,000 to 1000 cm/sec.) C. HIGH (1000 to 10 cm/sec.) A. UNKNOWN F. VERY LOW (.001 tc .00001 cm/sec.) E. LOW (.1 to .001 cm/sec.) D. MODERATE (10 to .1 cm/sec.) 2. NO 3. COMMENTS: H. DISCHARGE AREA ___ 2. NO 3. COMMENTS: 2. SPECIFY DIRECTION OF SLOPE, CONDITION OF SLOPE, ETC. 1. ESTIMATE & OF SLOPE J. OTHER GEOLOGICAL DATA TOWARDS THE WEST

		XIV. PERMIT INFO					
ist all applicable permits h	neld by the site an	d provide the related info	1			COMPL	
A. PERMIT TYPE	B. ISSUING AGENCY	C. PERMIT NUMBER	D. DATE ISSUED (mo.,dey,&yt.)	E. EXPIRATION DATE (ma.,day,&yr.)	1. YES	mark 'X' 2. NO	3. UN KNOW
STHIF	TEPA	011451201	UNK	UNK	Χ		
•.							
	XV. PAST	I REGULATORY OR EN	FORCEMENT AC	TIONS	l	L	
NONE YES (*uma	narize in this space)						
,							
		,					
		·	•				
		·	• • •				

NOTE: Based on the information in Sections III through XV, fill out the Tentative Disposition (Section II) information on the first page of this form.



DATE 5/14/81

TIME 11:10 (A.M.) P.M.

DIRECTION: N NNE NE ENE

S SSW SW WSW WNW NNW

WEATHER CLOUDY HIGH

40'S SUTGHT DRIZZLE

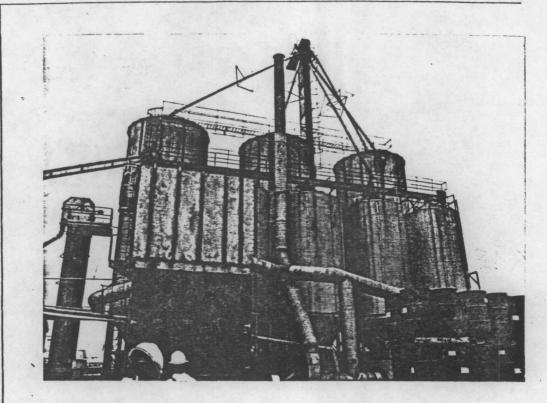
SITE TRENKER CHENTCHL

TDD# F5-8103-6

PHOTOGRAPHED BY:

CLAUDE MAYS

SAMPLE ID# (if applicable)



DESCRIPTION: PTCTUBE SHOWS STORAGE BINS AND BAGHOUSE AREA

DATE 5114 81

TIME 11:13 (A.M.) P.M.

DIRECTION: (N) NNE NE ENE

WEATHER CLOUDY HIGH

40'S LIGHT BAIN

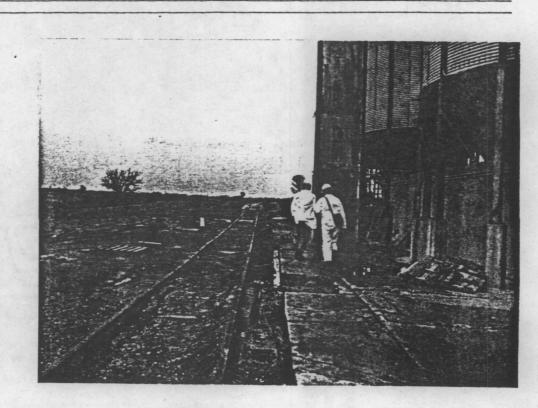
SITE TREKKER CHEMICAL

TOD# F5-8103-6

PHOTOGRAPHED BY:

CLAUDE MAYS

SAMPLE ID# (if applicable)



DESCRIPTION: PICTURE SHOWS FIRER OF CLAY UNLOADING TO STORAGE BINS

DATE 5/14/81
TIME 11:15 (A.M) P.M.

DIRECTION: N NNE NE ENE E ESE SE SSE

S SSW SW WSW W WNW NW NNW

WEATHER CLOUDY HIGH

405 LIGHT BAIN

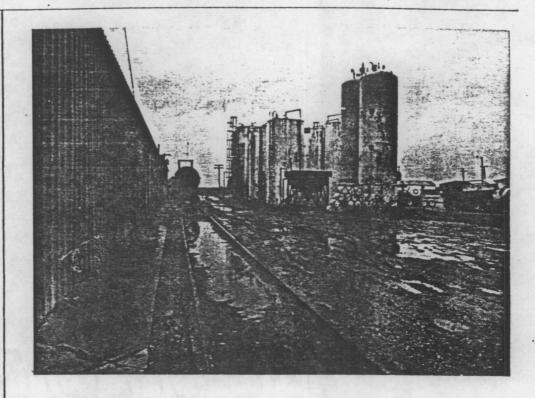
SITE TRENKER CHENTCAL

TDD# F5-8103-6

PHOTOGRAPHED BY:

CLAUDE MAYS

SAMPLE ID# (if applicable)



DESCRIPTION: PTCTURE SHOWS OIL AND SOLVENT STORAGE PARET

DATE 5/14/81

TIME 12:09 A.M. P.M.

DIRECTION: N NNE NE ENE

E ESE SE SSE S SSW SW WSW

W WNW NW NNW

WEATHER CLOUDY HIGH

40'S LIGHT BAIN

SITE TRENKER CHENTONL

TDO# F5-8103-6

PHOTOGRAPHED BY:

CLAUDE MAYS

SAMPLE ID# (if applicable)

81 11 808 516



DESCRIPTION: SUMP PIT WHITED (LEFT) LOCATED BELOW THE MIXING VAIS
IN THE LIQUID DEPARTMENT

DATE	5/14/9	81
		A.M. (P.M.)

DIRECTION: N NNE NE ENE
E ESE SE SSE
S SSW SW WSW
WNW NW NNW

WEATHER CLOUDY HIGH
405 LIGHT BAIN

SITE TREMMER CHETTICAL

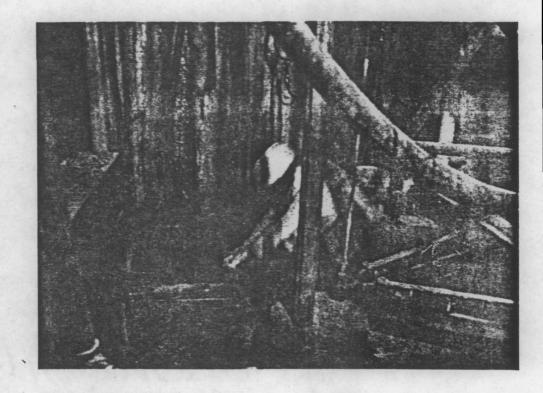
TDD# F5-8103-6

PHOTOGRAPHED BY:

CLAUDE MAYS

SAMPLE ID# (if applicable)

817308517



DESCRIPTION: SUMP PIT WATER # 2 LOCATED BELOW THE MIXING UATS

IN THE LIQUID DEPARTMENT.

DATE	

TIME _____ A.M. P.M.

DIRECTION: N NNE NE ENE E ESE SE SSE S SSW SW WSW

WEATHER _____

SITE ____

PHOTOGRAPHED BY:

TDD#

SAMPLE ID# (if applicable)

РНОТО

DESCRIPTION:

... -